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Attorney for Defendant  
NICASIO ROMAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:21-cr-00230-JAM
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>CONTINUE STATUS CONFERENCE</b>
v.	)	<b>AND EXCLUDE TIME</b>
	)	
NICASIO ROMAN,	)	Date: March 12, 2024
	)	Time: 9:00 a.m.
Defendant.	)	Judge: Hon. John A. Mendez
	)	

**IT IS HEREBY STIPULATED**, by and between the parties, through their respective counsel, Assistant United States Attorney Elliot Wong counsel for Plaintiff, and Assistant Federal Defender Linda Harter, counsel for defendant Nicasio Roman, that the status conference scheduled for March 12, 2024 at 9:00 a.m. be continued to **May 07, 2024 at 9:00 a.m.**

This additional continuance is requested in order to work out logistics with pretrial services and for counsel to discuss a potential plea agreement.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from this order's date through and including May 7, 2024; pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

1 Dated: March 6, 2024

Respectfully submitted,

2 HEATHER E. WILLIAMS  
3 Federal Public Defender

4 /s/ Linda Harter  
LINDA HARTER  
5 Assistant Federal Defender  
Attorney for Defendant NICASIO ROMAN

6 Dated: March 6, 2024

7 PHILLIP A. TALBERT  
United States Attorney

8 /s/ Elliot Wong  
9 ELLIOT WONG  
Assistant US Attorney  
10 Attorney for Plaintiff  
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**ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, **ADOPTS** the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including May 7, 2024, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the March 12, 2024 status conference is **CONTINUED to May 07, 2024, at 9:00 a.m.**

Dated: March 06, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE